STATE OF CONNECTICUT APPELLATE COURT

DOCKET NO.: AC 42327 :

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STATE OF CONNECTICUT, Appellee,

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TYWAN EDWARDS, Appellant. : May 29, 2019

MOTION FOR AN EXTENSION OF TIME TO FILE BRIEF

Introduction: This is a motion for an extension of time, for approximately two months, until Monday, August 19, 2019, for the filing of the Defendant-Appellant's brief in the above-captioned case.

Brief history of the case: Tywan Edwards appeals from his conviction in the Judicial District of New Haven. The undersigned was trial counsel in the case, and indicated a willingness to represent Mr. Edwards on appeal. The office of the Chief Public Defender - Legal Services has recently requested the undersigned to accept the assignment, and the undersigned has accepted, and today filed his appearance.

Specific facts upon which the moving party relies: In order properly to prepare a brief, the undersigned will be required to:

- retrieve the file from the Chief Public Defender
- read the transcripts and review the exhibits
- identify the issues which will be the subject of the brief

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research those issues

write and file the brief

prepare and file an appendix

The undersigned estimates that, with all the other work on other cases that he has to perform, it will take him about two months to prepare a thoroughly researched, carefully argued brief.

The undersigned has discussed this matter with the Chief State's

Attorney Appellate Section and the State does not oppose the granting of this motion.

Legal grounds upon which the moving party relies: Motions for an extension of time within which to file a brief are authorized by Practice Book § 66-1(b).

Conclusion: For the above-stated reasons, the defendant-appellant Tywan Edwards respectfully requests that the Court extend the time within which his brief and appendix must be filed until Monday, August 19, 2019.

Respectfully submitted,

JEREMIAH DONOVAN 123 Elm Street--Unit 400 P.O. Box 554 Old Saybrook, CT 06475 (203) 388-3750 Juris no. 305346 Fed.bar.no. CT 03536

[PROPOSED] ORDER

The above and foregoing motion having been heard and considered, it is hereby

granted / denied.

JUDGE / CLERK

CERTIFICATION OF FORM AND SERVICE

This is to certify that this motion complies with the provisions of Practice Book §66-3 and that a copy of the above and foregoing on this May 29, 2019 was mailed postage prepaid to Chief State's Attorney - Appellate Section, 300 Corporate Place, Rocky Hill, CT 06067.

JEREMIAH DONOVAN